

## **EXHIBIT 4**

**UNREDACTED VERSION  
OF DOCUMENT SOUGHT  
TO BE SEALED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

/

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

WAYMO LLC RULE 30(b)(6)  
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ  
PALO ALTO, CALIFORNIA  
THURSDAY, AUGUST 3, 2017

REPORTED BY:

ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2663199

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Videotaped Deposition of Pierre-Yves Droz  
taken on behalf of the Defendant, on August 3,  
2017, at Morrison & Foerster LLP, 950 Page Mill  
Road, Palo Alto, California, beginning 9:27 a.m.,  
and commencing at 7:25 p.m., Pursuant to Notice,  
and before me, ANDREA M. IGNACIO, CSR, RPR, CRR,  
CLR ~ License No. 9830.

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13 MR. KIM: All right. 13:33

14 Q So I -- I don't understand why you're saying 13:33

15 from your personal knowledge. You know, we -- we 13:33

16 looked earlier at your deposition topics. 13:33

17 A Yep. Okay. 13:33

18 Q And Exhibit 1273 specifically asks for the 13:33

19 time cost and specific people involved in developing 13:33

20 each of the alleged trade secrets. 13:33

21 MR. JAFFE: Which topic are you reading from? 13:33

22 MR. KIM: Deposition Topic No. 9. 13:33

23 Q And so I'm asking you about the -- the cost 13:33

24 to implement [REDACTED] -- 13:33

25 A So, are you asking what -- 13:34

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## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 THE WITNESS: Sorry. Go ahead. 13:34

2 MR. JAFFE: One -- one second here. 13:34

3 THE WITNESS: Yes. 13:34

4 MR. JAFFE: So, Mr. Droz is here subject to 13:34

5 our objections. As I stated at the outset of this 13:34

6 deposition, he's designated on the development of the 13:34

7 asserted trade secrets other than 25. So I just want 13:34

8 to make that clear for the record. 13:34

9 Go ahead. 13:34

10 THE WITNESS: I think also here there is true 13:34

11 costs, too. There is the cost of the actual units. 13:34

12 You know, is the -- the unit cheaper? 13:34

13 There's also the development cost, which is 13:34

14 the -- the -- how much, you know, the -- the cost was 13:34

15 used to -- to develop the -- the -- those boards. 13:34

16 So is your question about the actual cost of 13:34

17 the -- the finished good, basically -- or not finished 13:34

18 good, but the cost of the boards -- of making the 13:34

19 boards, or the cost of developing, you know, the -- 13:34

20 the boards? 13:34

21 MR. KIM: Let's talk about the cost for 13:34

22 developing the boards. 13:34

23 Q So how much did it cost to develop the trade 13:34

24 secret of [REDACTED] 13:35

25 MR. JAFFE: Objection; form; outside the 13:35

1 scope. 13:35

2 THE WITNESS: So -- so from my personal 13:35

3 knowledge, the -- you know, the -- I don't -- you 13:35

4 know, I don't have an actual tracking of all the cost 13:35

5 used to -- to -- that we put in this. 13:35

6 But, you know -- you know, in there is 13:35

7 probably the cost of making prototypes, the cost of -- 13:35

8 of -- you know, the cost of the engineering on 13:35

9 designing those boards. 13:35

10 MR. KIM: Q. So, you're not prepared to talk 13:35

11 about the cost of development of Trade Secret No. 2 as 13:35

12 Waymo's corporate designated witness; is that correct? 13:35

13 A I'm not. 13:35

14 (Document marked Exhibit 1278 13:36

15 for identification.) 13:36

16 THE VIDEOGRAPHER: 1278. 13:36

17 THE WITNESS: Thank you. 13:36

18 MR. KIM: So I've marked for identification, 13:36

19 as Exhibit No. 1278, an e-mail from John McCauley at 13:36

20 Quinn Emanuel, dated Wednesday, August 2nd, 2017, at 13:36

21 7:56 p.m. 13:36

22 Q And, if you look at the second paragraph, it 13:36

23 says: 13:36

24 "Waymo designates Mr. Droz to testify with 13:36

25 regard to Topics 9 and 10 of Uber's second 30(b)(6) 13:37